

Hon. Robert J. Bryan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

ANNETTE BAKAY and RICHARD
BAKAY, husband and wife,

Plaintiffs,

vs.

LAURIE YARNES, in her individual and
official capacity as CLALLAM COUNTY
ANIMAL CONTROL OFFICER; LAURIE
A. YARNES and TODD A. YARNES, a
marital community; TRACEY KELLAS, in
her individual and official capacity as
CLALLAM COUNTY ANIMAL CONTROL
OFFICER, and RANDOLPH J. KELLAS,
husband and wife, a marital community;
CLALLAM COUNTY ex rel. CLALLAM
COUNTY SHERIFF'S OFFICE and
CLALLAM COUNTY ANIMAL
CONTROL, a Washington municipal
corporation; CHARLES B. SCHRAMM, in
his individual and official capacity as
PRESIDENT OF HUMANE SOCIETY OF
CLALLAM COUNTY (UBI 601-141-356), a
Washington nonprofit corporation;
CHARLES B. SCHRAMM and JANE DOE
SCHRAMM, a marital community;
HUMANE SOCIETY OF CLALLAM
COUNTY (UBI 601-141-356); TEV
BARROS, D.V.M. (vt6853), individually;

No. C04-5803-RJB

STIPULATED MOTION AND ORDER
TO EXTEND DISCLOSURE OF
EXPERT TESTIMONY UNDER
FRCP26(A)(2)

CLERK'S ACTION REQUIRED

{5077211.DOC}
STIPULATED MOTION TO EXTEND DISCLOSURE
OF EXPERT TESTIMONY UNDER FRCP26(A)(2)

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P.S., Inc. · Pacific Northwest Law Offices
1800 One Convention Place · 701 Pike Street · Seattle · WA · 98101 · 3929
Tel. 206.624.7990 · Toll Free 877.624.7990 · Fax 206.624.5944

TEV M. BARROS and JANE DOE
BARROS, a marital community; and DOES
1-10,

Defendants.

I. STIPULATED MOTION

COMES NOW the parties in this matter, by and through their respective attorneys of record and stipulate to the extension for disclosure of expert testimony under FRCP(a)(2) from August 3, 2005, until September 6, 2005. The parties jointly move for an Order of the Court granting such an extension.

The parties acknowledge that deposition discovery has yet to occur in this case due to dispositive motion practice and past availability issues. Additionally, written discovery is presently and concurrently being exchanged that will affect retention of experts and related disclosures. To ensure meaningful disclosure of expert testimony, an extension to September 6, 2005, is reasonable and respectfully requested.

DATED this 29th day of July, 2005.

LEE SMART COOK MARTIN &
PATTERSON, P.S., INC.

By: /s/ Charles P.E. Leitch
Charles P.E. Leitch, WSBA No. 25443
Of Attorneys for Defendants Yarnes, Kellas and
Clallam County

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LAW OFFICE OF ADAM P. KARP

By: /s/ Adam Karp
Adam Karp, WSBA No. 28622
Of attorneys for Plaintiffs

FLOYD & PFLUEGER, P.S.

By: /s/ Marshall Ferguson
Marshall Ferguson, WSBA No. 29528
Of attorneys for Defendants Barros

LAW OFFICE OF MATTHEW D. WILLIAMS

By: /s/ Robert Reinhard
Robert Reinhard, WSBA No. 10890
Of attorneys for Defendants Schramm and
Humane Society of Clallam County

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STIPULATED MOTION TO EXTEND DISCLOSURE
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II. ORDER

IT IS SO ORDERED.

DONE this 2nd day of August, 2005.



ROBERT J. BRYAN
United States District Judge

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CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury and the laws of the State of Washington that on June 28, 2005, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Mr. Adam Karp
Law Office of Adam P. Karp
114 W. Magnolia Street, Suite 425
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Mr. Grant F. Hopper
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2505 Third Avenue, Suite 300
Seattle, WA 98121-1445

Mr. Robert D. Reinhard
Law Offices of matthew W. Williams
3315 S. 23rd Street, Suite 310
Tacoma, WA 98405

DATED this 29th day of July, 2005.

Julie DeShaw, Legal Assistant for
Charles P.E. Leitch

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STIPULATED MOTION TO EXTEND DISCLOSURE
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